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16 Attorneys for Plaintiff
17 UNITED STATES OF AMERICA

18 UNITED STATES DISTRICT COURT

19 FOR THE CENTRAL DISTRICT OF CALIFORNIA

20 UNITED STATES OF AMERICA,

21 No. 2:23-CR-59-MEMF

22 Plaintiff,

23 STIPULATION TO CONTINUE
24 SENTENCING

25 v.

26 CAROLINE JOANNE HERRLING,

27 Defendant.

28 Plaintiff United States of America, by and through its counsel
of record, and defendant CAROLINE JOANNE HERRLING ("defendant"),
both individually and by and through her counsel of record, hereby
jointly request a sentencing continuance:

29 1. Defendant pled guilty and is currently set for sentencing
30 on July 7, 2023, at 10:00am. No previous sentencing
31 continuances have been sought.

32 2. The Probation Office has identified this sentencing as
33 unusually complicated and would like more time to prepare
34 a thorough Presentence Report.

1 3. The information the government is contractually permitted
2 to provide to the Probation Office depends on whether or
3 not defendant complied with her obligations under the plea
4 agreement. The government believes defendant has not
5 complied with those obligations, and intends to file a
6 motion asking the Court to declare that defendant breached
7 the plea agreement.

8 4. Defendant wishes to analyze the discovery materials that
9 the government believes showed she breached her plea
10 agreement. Defendant hopes that the parties can obviate a
11 motion for a declaration of breach of plea agreement.

12 5. The parties hope that a continuance to September 28, 2023,
13 will allow them sufficient time to resolve this issue
14 among themselves, or by briefing it to the Court
15 sufficiently in advance of sentencing so that the
16 Probation Office has all the information it is entitled to
17 when completing the Presentence Report.

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Accordingly, the parties jointly request a sentencing continuance to September 28, 2023, or as soon thereafter as is convenient for the Court.

IT IS SO STIPULATED

Dated: May 11, 2023

Respectfully submitted,

E. MARTIN ESTRADA
United States Attorney

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Assistant United States Attorney
Chief, Criminal Division

Andrew Brown

ANDREW BROWN
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Attorneys for Plaintiff
UNITED STATES OF AMERICA

Dated: May 22, 2023

Alex Kessel

ALEX KESSEL
Attorney for Defendant
[By email authorization]